1 2 3 4 5 6 7	Veronica Arechederra Hall, Bar No. 5855 veronica.hall@jacksonlewis.com Paul T. Trimmer, Bar No. 9291 trimmerp@jacksonlewis.com JACKSON LEWIS LLP 3800 Howard Hughes Parkway, Suite 600 Las Vegas, Nevada 89169 Tel: (702) 921-2460 Fax: (702) 921-2461 Attorneys for Defendant UNITED STATI	ES DISTRICT COURT
8	DISTRICT OF NEVADA	
9 110 111 112 113 114 115	KATIE L. GREEN, an individual, Plaintiff, v. AMERICAN HOSPITAL SERVICE GROUP, INC., a foreign limited liability company doing business in Nevada, DOES I through X and ROES I through X, Defendant.	Case No. 2:11-CV-01533-PMP-LRL DEFENDANT'S MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT (First Request)
17 18 19	Pursuant to LR 6-1, Defendant AMERICAN HOSPITAL SERVICES GROUP, LLC, improperly named as AMERICAN HOSPITAL SERVICE GROUP, INC. ("Defendant"), submits the following Motion to Extend Time to Answer or Otherwise Respond to Plaintiff's Complaint.	
20	This motion is submitted and based on the following:	
21	1. This is the first request for an	extension of time for Defendant to file its answer or
22	otherwise respond to Plaintiff's Complaint.	
23	2. Defendant's response to Pla	aintiff's Complaint is currently due on Tuesday,
24	January 31, 2012.	
25	3. Due to Defense Counsel's re-	cent engagement to defend the case and preexisting
26 27	obligations, a short additional amount of time is necessary to review the Complaint and prepare a	
28	response.	

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1	4. Because Plaintiff is unrepresented, and in an abundance of caution, Defendant is
2	filing this Motion rather than arranging for the extension via stipulation.
3	 Accordingly, Defendant respectfully requests the Court to enter an order extending
4	the time in which to answer or otherwise respond to Plaintiff's Complaint by two weeks to and
5	including February 14, 2012.
6	6. Furthermore, this request for an extension of time to file Defendant's answer o
7	otherwise response to Plaintiff's Complaint is made in good faith and not for the purpose o
9	delay.
10	Dated this U 6 day of January, 2012.
11	JACKSON LEWIS LLP
12	+an
13	Veronica Arechederra Hall, Bar No. 5855 Paul T. Trimmer, Bar No. 9291
14 15	3800 Howard Hughes Parkway, Suite 600 Las Vegas, Nevada 89169
16	Attorneys for Defendant
17	IT IS SO ORDERED.
18	II IS SO ORDERED.
19	Contacto
20	CAM FERENBACH
21	UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE I hereby certify that I am an employee Jackson Lewis LLP and that on this 26 day of January, 2012, I caused to be sent via U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing DEFENDANT'S MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT properly addressed to the following: Katie L. Green 21 W. Owens Ave. #319 North Las Vegas, NV 89030 Employee of Jackson Lewis LLP 4819-7852-9550, v. 1

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